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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Amendment of Section 72.622(b),	)	MM Docket No. _____
Table of Allotments, Digital	)	RM- ____
Television Broadcast Stations	)	
(Jamestown, North Dakota)	)	

To: Chief, Video Services Division
Mass Media Bureau

PETITION FOR RULEMAKING

Red River Broadcast Co., LLC ("Red River"), licensee of television broadcast station KJRR(TV), Jamestown, North Dakota, hereby petitions the Commission to amend the DTV Table of Allotments set forth at Section 73.622(b) of its Rules, by changing KJRR's DTV allotment from Channel 14 to Channel **30**, and to specify the maximum UHF DTV non-directional power of 1000 kw. This proposal complies with the Commission's Rules for DTV channel allotment substitutions.

The Commission initially allotted DTV Channel 14 to KJRR, which presently serves Jamestown on NTSC Channel 7. Based on concerns as to possible problems resulting from land mobile operations on Channel 14, Red River retained Cohen Dippell & Everist, P.C., to study the alternative of operating on DTV Channel 30.

Cohen Dippell & Everist evaluated the allotment of DTV Channel 30 for KJRR using OET Bulletin No. 69 and the supplemental processing guidelines that

were later issued by the Commission. They evaluated the proposal for technical acceptability by applying the interference standards and other engineering criteria set forth in Section 73.623(c) of the Rules. They assessed the impact of operation on DTV Channel 30 on other authorized NTSC stations, DTV allotments, and other proposed DTV allotments.

Cohen Dippell & Everist concluded that substituting DTV Channel 30 for KJRR in the Table of Allotments would not result in additional interference in excess of that permitted by the Rules. Any interference would be less than the 2% *de minimis* level permitted by Section 62.623. They thus found that Channel 30 could be allotted in accordance with those Rules. (See attached Engineering Statement.)

The Engineering Statement also states that modifying KJRR's DTV allotment to Channel 30, and authorizing the station to operate at the maximum UHF DTV non-directional power of 1000 kw, will generate a service area which totally encompasses Jamestown, North Dakota, the station's community of license.

Red River intends to apply for DTV Channel 30 if it is allotted and to build DTV facilities on that channel.

ENGINEERING STATEMENT
PETITION FOR RULE MAKING
SECTION 73.622 OF THE FCC RULES
TO CHANGE DTV CHANNEL
ON BEHALF OF
KJRR-DT, JAMESTOWN, NORTH DAKOTA

OCTOBER 1999

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

Donald G. Everist, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer, a Registered Professional Engineer in the District of Columbia, and is President of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That his qualifications are a matter of record in the Federal Communications Commission;

That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.

Donald G. Everist
District of Columbia
Professional Engineer
Registration No. 5714

Subscribed and sworn to before me this 29th day of October, 1999.

Notary Public

My Commission Expires: 2/28/2003

This engineering statement has been prepared on behalf of Red River Broadcast Corp., licensee of Television Station KJRR(TV), Jamestown, North Dakota. KJRR(TV) is assigned NTSC Channel 7. It is proposed to change the current digital television channel allotment contained in Section 73.622 of the FCC Rules from UHF Channel 14 to UHF Channel 30 at the maximum UHF DT non-directional power of 1000 kW. The resulting service area totally encompasses the community of license.

An allocation study has been performed which assess the impact of this proposal on other authorized NTSC stations, DTV allotments listed in Table B[1] and other proposed DTV allotments. This technical analysis has been conducted using the Federal Communications Commission's ("FCC") OET Bulletin 69 dated July 2, 1997 and the FCC supplemental processing guidelines dated August 1998. The analysis was performed by using the FCC's is Longley-Rice (FLR) model adapted for use for an INTEL computer. The results of this adapted FLR program has been compared to other known FCC studies and have been found to give comparable results.

Existing Allocation Parameters
KJRR-DT Specified in Table of Allotments, Page B-36

DTV Channel	Effective Radiated Power	Height Above Average Terrain
14	1000 kW existing site coordinates	135 meters

KJRR-DT Proposed DTV Facilities

30	1000 kW existing site coordinates	135 meters

[1]In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service", MM Docket No. 87-268, Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order (FCC 98-24), 2/12/98.

As shown in Table1, modifying the DTV or allotment for KJRR(TV) would not result in additional interference in excess of that permitted by the FCC's Rules.

Further, an examination of co-channel television and translators has been performed within 100 km. No low power or translator stations are found. Therefore, it is believed that the request for DTV channel will be consistent with the FCC Rules.

CHANNEL 30
INTERFERENCE SUMMARY
KJRR-DT, JAMESTOWN, NORTH DAKOTA

A study of predicted interference by the proposed KJRR-DT service has been performed using a version of the Longley-Rice program as described in OET Bulletin No. 69 (July 2, 1997) and the Public Notice, "Additional Application Processing Guidelines for Digital Television (DTV)" (August 1998). The FCC's FORTRAN-77 code was modified only to the extent necessary (primarily input/output handling) for the program to run on a Windows98/Intel platform. Comparison of service/interference areas and populations indicates that this model closely matches the FCC's evaluation program. Best efforts have been made to use data and calculations identical to the FCC's program. Any slight differences are attributable to compiler, operating system and/or processor characteristics. The effect of any variance in calculated population values versus the FCC's program is minimized when differencing a given model's results, e.g., new interference equals total interference less baseline interference. The effect is further reduced for ratios of calculated population values, e.g., incremental population affected as a percent of total population served. The model employs the Longley-Rice propagation methodology and evaluates in grid cells of approximately 4 km^2 using 3-second terrain data sampled approximately every 0.1 km at one degree azimuth intervals with 1990 census centroids.

Baseline KJRR-DT: Allotment, UHF Channel 14, 1000 kW, 135 Meters HAAT
N 46° 55' 30", W 98° 46' 21" (NAD-27)

Proposed Change: UHF Channel 30, 1000 Kw omni-directional, 135 Meters HAAT
N 46° 55' 30", W 98° 46' 21" (NAD-27)

Affected Station	Distance/Bearing	Interference (% of Population Served) Baseline	New
NEW, CH.27, Grand Forks, ND Application, 5000 kW, 921 m AMSL	115.6 km/69.5°	0.0	0.1

Studied with an omni-directional pattern for worst-case scenario.